



**Office of the New York State  
Attorney General**

**Letitia James  
Attorney General**

February 27, 2025

**By ECF**

Honorable Anne M. Nardacci  
United States District Court  
James T. Foley United States Courthouse  
445 Broadway  
Albany, New York 12207

Re: *United States of America v. State of New York et al.*  
No. 25-cv-205 (AMN) (MJK)

Judge Nardacci:

This office represents defendants the State of New York, and Governor Kathy Hochul, Attorney General Letitia James, and the State Department of Motor Vehicles Commissioner Mark J.F. Schroeder, all of whom are sued in their official capacities in the above-referenced action.

I am writing to request a brief extension of defendants' time to respond to the complaint through March 25, 2025. Plaintiff does not oppose the request. At present, defendants' deadlines to respond to the complaint are March 6 (for the State and Attorney General James), and March 11 (for Governor Hochul and Commissioner Schroeder). This the first request for an extension, which is being made (1) to consolidate the responsive deadlines for defendants to a single date, and (2) to allow defendants time to review the allegations set forth in the complaint and prepare an appropriate joint response.

Thank you for your attention and consideration in this matter.

Respectfully submitted,

/s/ Linda Fang \_\_\_\_\_  
LINDA FANG  
Special Litigation Counsel  
(212) 416-8580  
Linda.Fang@ag.ny.gov